

EXHIBIT 4

FILED UNDER SEAL

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CASE NUMBER: 16-cv-1054 (WMW/DTS)

Fair Isaac Corporation, a Delaware corporation,
Plaintiff,
versus
Federal Insurance Company, and Indiana
corporation, and ACE American Insurance Company, a
Pennsylvania corporation,
Defendants.

VIDEOTAPED DEPOSITION OF FEDERAL RULE OF CIVIL
PROCEDURE 30(b)(6) FEDERAL INSURANCE COMPANY and
ACE AMERICAN INSURANCE COMPANY WITNESS DESIGNEE

RAMESH PANDEY

TAKEN: 26 November 2019 BY: Jackie McKone

<p style="text-align: right;">Page 6</p> <p>1 under oath as follows.</p> <p>2 * * *</p> <p>3 EXAMINATION</p> <p>4 BY MR. HINDERAKER:</p> <p>5 Q. Good morning. We met, we commented in the hallway</p> <p>6 about our -- the frequency of our interactions</p> <p>7 here in --</p> <p>8 A. Many times.</p> <p>9 Q. So I know that we've done, you know, you and I</p> <p>10 have -- you have sat for examination now this will</p> <p>11 be the third time in this lawsuit, and did you</p> <p>12 meet with counsel to prepare for the deposition</p> <p>13 today?</p> <p>14 A. Yup.</p> <p>15 Q. It would be helpful I think sir if when you're</p> <p>16 answering try to speak up a bit.</p> <p>17 A. Yes.</p> <p>18 Q. And of course, having a verbal answer rather than</p> <p>19 a nod or a gesture. So how long did you -- how</p> <p>20 long did you prepare for today's deposition?</p> <p>21 A. Yesterday and today also. So two days.</p> <p>22 Q. How many hours would you say?</p> <p>23 A. Few hours yesterday, was a good long day. I came</p> <p>24 early so it was a long time.</p> <p>25 Q. I'm sorry. What?</p>	<p style="text-align: right;">Page 8</p> <p>1 (Whereupon a short break was taken from</p> <p>2 9:30 a.m. to 9:33 a.m.) 0</p> <p>3 THE VIDEOGRAPHER: We are back on the</p> <p>4 record. The time now is 9:32 a.m.</p> <p>5 BY MR. HINDERAKER:</p> <p>6 Q. So about five months ago, you had a new role</p> <p>7 integration architect, ICC?</p> <p>8 A. Yes.</p> <p>9 Q. And previous to that, you were?</p> <p>10 A. Chief architect for North America.</p> <p>11 Q. For how long did you have that role?</p> <p>12 A. Four years.</p> <p>13 Q. So beginning in about 1915 -- 2015?</p> <p>14 A. Yes.</p> <p>15 Q. Then before being chief architect of North</p> <p>16 America, what role was your role?</p> <p>17 A. Chief architect for Chubb, the original Chubb,</p> <p>18 Legacy Chubb.</p> <p>19 Q. What was the -- when you were chief architect for</p> <p>20 Legacy Chubb, what was the geographic scope of</p> <p>21 that responsibility?</p> <p>22 A. North America. Mainly US, Canada. US and Canada.</p> <p>23 Q. Okay. So all right, and for how long did you have</p> <p>24 that role?</p> <p>25 A. Less than two years.</p>
<p style="text-align: right;">Page 7</p> <p>1 A. Yesterday almost all day.</p> <p>2 Q. I have to get my ear tuned to you. Well, I'm not</p> <p>3 going to go through all of the things that we've</p> <p>4 done in the past but only to -- only to say if I</p> <p>5 ask a question that isn't clear to you or you do</p> <p>6 not understand --</p> <p>7 A. Okay.</p> <p>8 Q. -- please let me know.</p> <p>9 A. Sure.</p> <p>10 Q. Okay. I recall -- well, rather than me recall,</p> <p>11 your job title is what please?</p> <p>12 A. Now I'm the head of the integration architect and</p> <p>13 ICC delivery center.</p> <p>14 Q. So I understood integration architect?</p> <p>15 A. Integration delivery centers -- integration center</p> <p>16 of competency. I lead that group.</p> <p>17 Q. When did you assume that role?</p> <p>18 A. About five months back. So I was the chief</p> <p>19 architect for North America. Now I took the ICC</p> <p>20 delivery also.</p> <p>21 MS. JANUS: One moment. Did something</p> <p>22 happen so that someone called in? We have a live</p> <p>23 video --</p> <p>24 THE VIDEOGRAPHER: We're going off the</p> <p>25 record. The time is 9:30. 0</p>	<p style="text-align: right;">Page 9</p> <p>1 Q. Have you -- going to the current time, integration</p> <p>2 architect, what's the geographic scope of that</p> <p>3 responsibility?</p> <p>4 A. That's the North America mainly from architecture</p> <p>5 point of view, but the ICC delivery is global.</p> <p>6 Q. Then before chief architect for Legacy Chubb, you</p> <p>7 were --</p> <p>8 A. I was with Citibank.</p> <p>9 Q. This has been marked as Exhibit 527, and when was</p> <p>10 first time you saw this?</p> <p>11 A. Couple of weeks back, few weeks back.</p> <p>12 Q. Did you have any role in the preparation of</p> <p>13 Exhibit 527?</p> <p>14 A. Yes.</p> <p>15 Q. What was it?</p> <p>16 A. So I collected all the -- I reached out to all the</p> <p>17 team leads, architects, and different team members</p> <p>18 to find the information so that I can put the</p> <p>19 dates and version for the delete, the records, and</p> <p>20 also which data center they were deployed and</p> <p>21 everything. So all of it associated with this I</p> <p>22 did it.</p> <p>23 Q. So let me just -- let me back up. So what I heard</p> <p>24 you say is you reached out to the persons in the</p> <p>25 different locations who had responsibility.</p>

<p style="text-align: right;">Page 10</p> <p>1 A. Yes.</p> <p>2 Q. Okay. Did you yourself gather any of the</p> <p>3 underlying documents that had the responsive</p> <p>4 information?</p> <p>5 A. Yes. Working with those teams, let's say for</p> <p>6 Europe, working with Mike Hutchinson and his team,</p> <p>7 working with Canada, that team. So yes. I --</p> <p>8 they were gathering, but I was talking to all of</p> <p>9 them. Mostly.</p> <p>10 Q. So let me just go country by country and</p> <p>11 understand the liaisons that you worked with. So</p> <p>12 Canada; with whom did you work?</p> <p>13 A. Silverio Miranda, he's the chief architect for</p> <p>14 Canada. Zorica --</p> <p>15 Q. I can't go that fast. Can you spell the person's</p> <p>16 name for Canada?</p> <p>17 A. Silverio, S-I-L-V-E-R-I-O.</p> <p>18 Q. The last name?</p> <p>19 A. Miranda, M-I-R-A-N-D-A.</p> <p>20 Q. All right. Thank you. Then who else in Canada?</p> <p>21 A. Zorica, Z for zebra, O-R-I-C-A, last name</p> <p>22 Todorovic.</p> <p>23 Q. That would be T-O-D-O-R-O-V-I-C?</p> <p>24 A. Exactly.</p> <p>25 Q. That one I have.</p>	<p style="text-align: right;">Page 12</p> <p>1 A. Gislanjani (phonetic).</p> <p>2 Q. I thought he was a US guy.</p> <p>3 A. He's responsible for US and UK both, but he lives</p> <p>4 in the UK, but he's responsible for US.</p> <p>5 Q. So Mike Hutchinson, Claudio. Anybody else that</p> <p>6 was primarily --</p> <p>7 A. These are the two main.</p> <p>8 Q. All right, and then Australia?</p> <p>9 A. Same; Mike Hutchinson and Claudio.</p> <p>10 Q. All right. So I --</p> <p>11 A. For Australia also Zorica, Zorica Todorovic. She</p> <p>12 also gives information.</p> <p>13 Q. Zorica? Zorica?</p> <p>14 A. Yes.</p> <p>15 Q. She's a Canadian person as well?</p> <p>16 A. Yes, Canadian, and she also informs about</p> <p>17 Australia.</p> <p>18 Q. Then anyone else that were the principal people?</p> <p>19 A. That's it.</p> <p>20 Q. So let me run through a series of names that came</p> <p>21 to me with respect to this deposition, and let me</p> <p>22 know if you've talked to them?</p> <p>23 A. Okay.</p> <p>24 Q. Tony Zhang?</p> <p>25 A. He's under Silverio. So Silverio must have talked</p>
<p style="text-align: right;">Page 11</p> <p>1 A. Yup.</p> <p>2 Q. Anyone else?</p> <p>3 A. Also I talked to Shailesh Sharma, and a lot of</p> <p>4 people. These are the teammates.</p> <p>5 Q. Would you spell the third person please?</p> <p>6 A. Shailesh, S-H-A-I-L-E-S-H S-H-A-R-M-A.</p> <p>7 Q. That's the last name?</p> <p>8 A. Yes.</p> <p>9 Q. Say that again?</p> <p>10 A. S-H-A-R-M-A.</p> <p>11 Q. So were they the main people for Canada?</p> <p>12 A. Exactly.</p> <p>13 Q. All right, and then for the UK, for Europe?</p> <p>14 A. It's Mike, Michael Hutchinson.</p> <p>15 Q. Before I ask the next person, do you make a</p> <p>16 distinction between the UK and Europe, or is that</p> <p>17 the same --</p> <p>18 A. They are same thing for us. It's Europe joined</p> <p>19 EUD. It's the same thing.</p> <p>20 Q. So you spoke with -- spoke with Mike Hutchinson,</p> <p>21 and who else?</p> <p>22 A. And Claudio.</p> <p>23 Q. Okay. Claudio is located in the US?</p> <p>24 A. UK.</p> <p>25 Q. Claudio -- what's Claudio's last name?</p>	<p style="text-align: right;">Page 13</p> <p>1 to him.</p> <p>2 Q. You don't know that one way or the other?</p> <p>3 A. Well, Silverio talked to his team. He's part of</p> <p>4 that team.</p> <p>5 Q. I'm just asking whether you spoke with him.</p> <p>6 A. No. Not directly. Through Silverio.</p> <p>7 Q. Henry Mirolyuz?</p> <p>8 A. No. He doesn't work for us anymore.</p> <p>9 Q. Cristian Vasilache?</p> <p>10 A. No.</p> <p>11 Q. Alexander Pavlenko?</p> <p>12 A. Pavelko. Yes. That's Silverio and Alex. Yes.</p> <p>13 Alex report to --</p> <p>14 Q. So they are Canadians, and they would be reporting</p> <p>15 to Silverio?</p> <p>16 A. Exactly.</p> <p>17 Q. But you did not speak to them --</p> <p>18 A. No. I talked to Alex, but I heard -- Silverio</p> <p>19 collected all the data for me.</p> <p>20 Q. So you did speak with Alex?</p> <p>21 A. Yeah, but I told her just help Silverio out.</p> <p>22 Q. Lance Martin?</p> <p>23 A. Lance is -- I didn't talk to him. No.</p> <p>24 Q. Richard Johnson?</p> <p>25 A. No.</p>